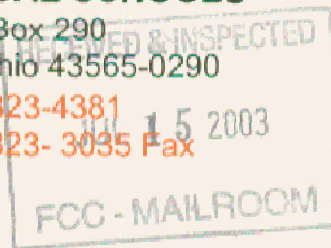


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P.O. Box 290
Tontogany, Ohio 43565-0290

(419) 823-4381

(419) 823-3035 Fax



Joseph L. Long
Superintendent
otjl@nwoca.org

Otsego High School
P.O. Box 290
Tontogany, Ohio 43565
419-823-4911
419-823-6421-Fax

Otsego Middle School
23939 Second St.
Grand Rapids, Ohio 43522
419-832-2261
419-832-0487-Fax

Grand Rapids Elementary
17595 Bridge St.
Grand Rapids, Ohio 43522
419-832-4765
419-832-2803-Fax

Haskins Elementary
405 N. Findlay
Haskins, Ohio 43525
419-823-1591
419-823-1116-Fax

Weston Elementary
13180 Broadway
Weston, Ohio 43569
419-669-3754
419-669-4242-Fax

www.otsegoknights.org

July 3, 2003

Ms. Marlene Dortch
Secretary, FCC
Room TW-B204
455 12th Street SW
Washington, D.C. 20554

Appeal of Otsego Public Schools
E-Rate Funding
CC Docket No. 96-45
CC Docket No. 97-21
471 Application No. 355487

Dear Secretary Dortch:

Congressman Paul E. Gillmor has advised that the Otsego School District can submit a letter to the Commission requesting a waiver of the urban designation in relation to our school district's E-Rate classification. All portions of our school district are in Congressman Gillmor's district, a rural agricultural district that stretches from an Amish area southeast of Cleveland through the northern portion of Ohio to the Indiana-Michigan border. Please consider this letter our request for a change in designation to rural.

Our school district covers over one-hundred fifty square miles and includes four small villages. When one travels between the villages they can easily count more farm tractors than people. No community in our county, Wood County, Ohio, approaches the criteria for urbanized based upon population. The City of Perrysburg (pop. 16,945) is classified urban based on it's proximity to Toledo in Lucas County. We are appealing the current classification following the logic that permits New England communities to be rural in a county classified urban. As in similar situations in New England, the proximity of a community of less than 17,000 denies relief under the act to the remainder of the county which is responsible for over 90% of the student population in the county.



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To illustrate the fact that we are indeed rural, one can review an AAA Tour Book of our area and find there are only three communities listed. These are Bowling Green, Perrysburg, and Grand Rapids. Bowling Green is noted because of its university. Perrysburg is listed as the site of Fort Meigs. Grand Rapids is in our school district and has a population of around 1,000. It is listed because of its historic grist mill and canal. Both Bowling Green and Perrysburg list accommodations in the tour book because of the motels along I-75. Grand Rapids is not listed. It is rural and has not motels. This is not surprising when the agricultural demographics of the Otsego School District are taken into account. A visitor to our school district coming from any direction would immediately recognize the district as being rural. Not unlike rural areas of the west or south.

It is very interesting to note that Claritas Incorporated provides a Web-site titled, "You Are Where You Live" and it clearly describes the communities in our school district rural. In fact, based on their PRIZM lifestyle segmentation system which defines every neighborhood in the U.S., we are described as having remote rural families. Pages from their site are attached for review. They reveal that our citizens are most likely to own a pick-up truck, own a tractor, and read Country Living. Does this sound like urban living?

Recent federal programs such as "NCLB" place undo economic hardships on rural school districts. Ohio's second ranking State Senator, our district's senator, has refused to endorse NCLB due to its impact on local schools. In neighboring Lucas County, a true suburban "urban" school district needs just five mills to raise forty million dollars for school construction and receives minimal state assistance for facilities because of it's industrial base and high personal income of it's residents. In contrast, our rural district must vote in twenty mills to raise forty million dollars for facilities.

Another example of our rural status is the fact that we pay a premium on our monthly phone bills to call an urban area, Toledo, or they pay long distance charges. The same applies to calls we make to suburban areas around Toledo. This is significant to our residents because they are served by medical facilities and other service agencies in the Toledo area.

Your consideration of our appeal is most appreciated. We hope to hear a positive response in the near future.

Sincerely,



Joe Long
Superintendent

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"You Are Where You Live" is based on our PRIZM lifestyle segmentation system. PRIZM defines every neighborhood in the U.S. in terms of demographically and behaviorally distinct types or "clusters." A precision tool for lifestyle segmentation and analysis, PRIZM offers a simple way to identify, understand, and target consumers. PRIZM links with virtually every major marketing database in the U.S., making it a lingua franca for integrated marketing.

Built with 1990 Census data, current-year demographics, and data from millions of consumer-purchase records, PRIZM contains 62 clusters across 15 social groups – from the affluent executives of "Blue Blood Estates" to the remote rural families of "Blue Highways" – PRIZM captures the diversity that is America.

Marketers use PRIZM to identify which clusters perform at above or below average rates for their products and services. By identifying the neighborhoods types where existing customers are, accurate predictions can be made for the neighborhood types where prospective customers are. Armed with this information, target marketing plans that focus on these areas can be implemented.

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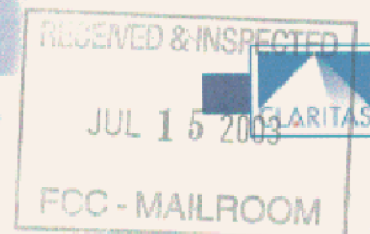
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43569

SUBMIT

**56 Agri-Business****Rural Farm-Town & Ranch Families**

Age group: Under 18, 45-64

Blue-Collar/Farming

Household income: 36,500

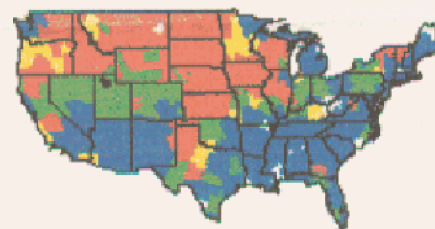
1.45% of U.S. households belong to this PRIZM Cluster.

This PRIZM Cluster is most likely to...

- Go horseback riding
- Buy romance novels
- Own a pick-up
- Watch nostalgia TV
- Read fraternal magazines

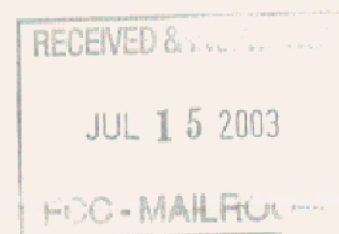
This PRIZM Cluster lives in neighborhoods like...

- Easton, MO
- Dundee, IA
- Pleasant Dale, NE



High	Above Average	Average	Below Average
------	---------------	---------	---------------

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43569

SUBMIT



44 Shotguns & Pickups

Rural Blue-Collar Workers & Families

Age group: Mixed

Blue-Collar/Farming

Household income: 38,500

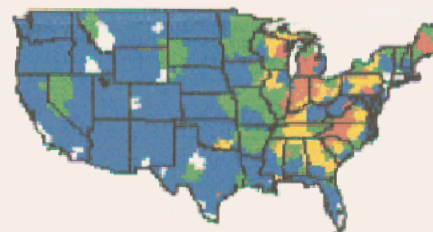
1.93% of U.S. households belong to this PRIZM Cluster.

This PRIZM Cluster is most likely to...

- Go fresh water fishing
- Own a dog
- Drink RC Cola
- Watch ESPN2
- Read Motor Trend

This PRIZM Cluster lives in neighborhoods like...

- Maple Rapids, MI
- Culleoka, TN
- Iron Station, NC



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43565

SUBMIT



58 Blue Highways

Moderate Blue-Collar/Farm Families

Age group: Under 18

Blue-Collar/Farming/Service

Household income: 28,700

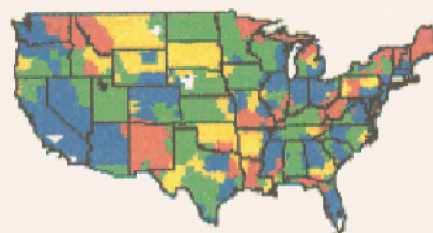
1.95% of U.S. households belong to this PRIZM Cluster.

This PRIZM Cluster is most likely to...

- Do furniture refinishing
- Own a dog
- Own a tractor
- Watch Court TV
- Read Country Living

This PRIZM Cluster lives in neighborhoods like...

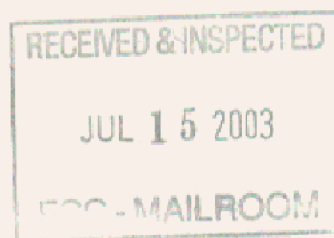
- Columbia Falls, MT
- Mackinaw City, MI
- Whitefield, NH



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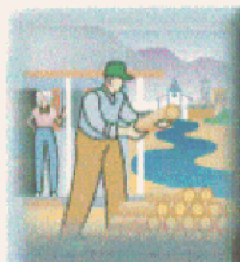
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43522

SUBMIT



43 River City, USA

Middle-Class, Rural Families

Age group: Under 18, 45-54

Blue-Collar/Farming

Household income: 39,900

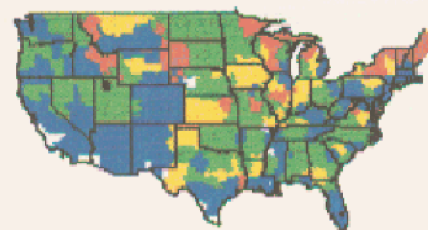
1.80% of U.S. households belong to this PRIZM Cluster.

This PRIZM Cluster is most likely to...

- Go target shooting
- Travel by train
- Own a cat
- Watch TNN
- Read Country Living

This PRIZM Cluster lives in neighborhoods like...

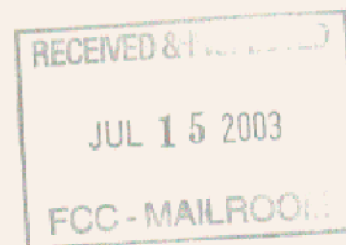
- Silver Creek, MN
- Springville, IA
- Coopers Mill, ME






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 WebMail - Telecommunications Act Letter of Nov. 2002 


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Date Sent: Tuesday, February 25, 2003 6:54 PM

From: "John L. Turkal" <john.turkal@gte.net> Add to Address Book

To: [mpowell <mpowell@fcc.gov>](mailto:mpowell@fcc.gov)

Cc: [mcopps <mcopps@fcc.com>](mailto:mcopps@fcc.com),

Subject: Telecommunications Act Letter of Nov. 2002

Status: ☐ Urgent ☐ New

John L. Turkal

15085 Cross Creek Road

Bowling Green, Ohio 43402

Ph: 419-823-3131

john.turkal@gte.net

FCC Chairman Michael K. Powell

FCC Commissioner Mrs. Kathleen Q. Abernathy

FCC Commissioner Mr. Johnathon Adelstein

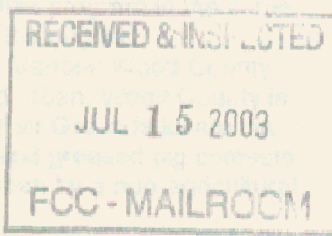
FCC Commissioner Kevin J. Martin

FCC Commissioner Michael J. Copps

Dear Madame and Gentlemen:

Enclosed for your information is a letter concerning the Telecommunications Act that I sent to Chairman Powell in November of 2002 concerning our Otsego School District located in rural Wood County of north west Ohio. I am a member of a unique committee appointed by our Superintendent Joe Long. The Otsego Cost Containment Committee, a small group of concerned residents , parents and non-parents, who assist and advise Mr. Long on the operation of the school district. Basically we review contracts and costs of bid items. Look into everyday operation of the various school departments and find the most cost-effective product or service for our small district. Items we have successfully looked into are water and sewer rates, electrical rates, bus fleet lube oil and diesel fuel costs, new boilers, heating systems and food service. These savings have allowed us to carpet class rooms that had the original carpet from over 25 years ago and upgrade 1920 heating systems.

We were instrumental in the passing of an Income Tax to finance our schools operation which allowed us to significantly reduce the real estate tax load on our farmers and retirees while increasing the over all revenue to the district. Obviously we look at any and all means of controlling and reducing our operating costs. A savings of a hundred dollars or a loss of a few thousand dollars in tax revenues can



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be significant to a rural school district whether it is in north west Ohio or the upper mid-west of which I am a native. As a grand parent and soon to be retiree I realize that our future is in the education of our children. School finances should not be a political foot ball, which unfortunately is the case both in Columbus and Washington.

This is why I wrote Chairman Powell concerning the discount our district receives under the Telecommunications Act. The Otsego Cost Containment Committee looks at this program in the same manner as we do the venders who sell us products and services. As noted in the original correspondence we consider our self a Rural and not an urban school district. Various Wood County Officials who assisted us were amused that our school district was considered urban. Wood County is the home of the National Tractor Pull held every August at our Wood County Fair Grounds located in Bowling Green, Ohio. Obviously a community that is into tractor pulls, F.F.A. and greased pig contests each year for youngsters brings into question the definition of Rural versus Urban by a non-agricultural federal agency.

We do not have the resources to read the Federal Registry on a daily basis or to monitor published changes in FCC Regulations. It is apparent that an effective communications channel had not been established to reach small rural entities, while the telecommuni-cations industry does have the resources and lobbyists to comment on your program and policies. One should be established.

The primary reason for this letter is to make you aware of the correspondence sent to Mr. Powell after what I consider a reasonable length of time for an acknowledgement of the correspondence and the initiation of a dialogue on how to address our request. I would appreciate any suggestions or comments you would have concerning this matter as the Otsego School District is obviously not the only school district facing this problem.

I had intended to travel to Washington to discuss this with Mr. Greg Lipscomb of your legal staff. However due to the fact that war is imminent and the terrorist threat is perceived to be real, Mrs. Turkal and I will not be traveling to D.C. Our youngest son is in Special Operations as direct support to the Rangers and we will stay close to home until he is safely back . He made the jump into Afghanistan and undoubtedly will drop into Iraq.

Respectfully yours,

John L. Turkal

John L. Turkal

OTSEGO COST CONTAINMENT COMMITTEE.

cc:

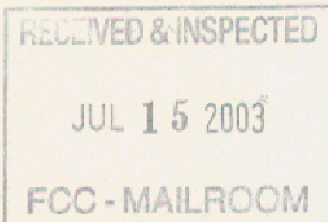
Otsego Cost Containment Committee

Congressman Paul Gilmor

U.S. Senator DeWine

U.S. Senator Voinovich

John L. Turkal



15085 Cross Creek Road
Bowling Green, Ohio 43402

419.823.3131

john.turkal@gte.net

Nov. 20, 2002

Mr. Michael K. Powell

Chairman

Federal Communications Commission

445 12th Street SW

Washington, D. C., 20554

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Dear Chairman Powell;

This correspondence is being written to you on the behalf of the Otsego School District, located in Tontogany, Ohio. The subject concerns the methodology in awarding the Rural versus Urban designation , outside of New England, to school districts receiving discounts under the Telecommunications Act of 1996. This is due to the assistance of Ms. Barbara Baker, Senior District Representative of Congressman Paul Gillmor and Mr. Greg Lipscomb an attorney in your Office of Plans and Policy.

Otsego School District is located in three northwestern Ohio counties, Wood, Henry and Lucas counties. Although it is primarily in Wood County, it was originally created with Providence Township located in western Lucas County and eastern portions of Henry County adjacent to Grand Rapids, Ohio. These were and remain agricultural areas. The district is 145 square miles and has four communities in it. Weston is the largest with 1,800 residents, Grand Rapids has 1,006 residents, while Haskins has approximately 750 and Tontogany 350 residents. In each of these communities the largest employer is the local school and provides the largest portion ,17 percent in Grand Rapids, of each communities operating budget. We are primarily an agricultural and small town community in which the local consolidated school and it's various school programs bind the towns together as a community. Similarly sized areas in New England who receive special consideration and rural designations are located near several cities of 50,000 residents or more.

In reviewing the documents provided to me it is not difficult to understand how the district was classified Urban under the act, even though we are not. It was, however, surprising to learn that an appeal process was not adopted during the original implementation of the act. The fact that New England received special consideration in how the designation of rural was applied, does not surprise me, having traveled extensively in that area. What does concern me is that in the areas outside of New England with the identical situation received no consideration and no process exists to remedy this problem.

Why do we feel we are rural? The following items are just a few that I will present

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to give you a feel for our area.

1. As previously stated, that area around Providence, Rhode Island and north to the Mass. State Line would be encompassed within our school district. The population density between the two is dramatically dissimilar. Otsego School District has 9,010 residents which extrapolates into 62 residents per square mile, or 24 households per square mile. This is hardly a compact Urban community. Politically we are Republican as most agricultural/ small communities are. When informed they are an urban system, most residents are amused and simply shake their heads at the Washington bureaucracy.
2. We have one grocery store, you would categorize it as a IGA type grocery store in Grand Rapids. Residents in our communities generally shop in Bowling Green, Waterville, Defiance and Findlay, Ohio.
3. Those residents who do not farm or work at farm related suppliers, drive considerable distances to work either in Toledo, Findlay, Napoleon, Bowling Green or the other communities mentioned above. Each local community has grain elevators, gas station /carry outs and restaurants/ taverns. The largest employer in our district is Sun Seeds located near Tontogany. Grand Rapids due to it's history as a river community and proximity to Mary Jane Thurston State Park, has a viable tourist orientated business district.
4. Although we have an affluent commuter community in our northern area, the vast majority are dependant on agriculture or employment in the surrounding communities. This is best demonstrated by reviewing our Block 4 Worksheet A, which graphically shows as you go deeper into our district that the economic affluence of our people diminishes. Mobile home courts house many households as their primary residence. As previously mentioned, the local elementary/ middle school/ high school is the largest employer in all of our four communities. In fact, this contributed to a recent defeat of a bond levy to replace 90 year old structures and to construct a centralize school campus. The loss of income tax revenues from their local school would devastate these towns. The state of Ohio would have provided matching funds and Governor Taft personally wrote a letter to our residents to support the Bond issue. Times are hard in RURAL Ohio.
5. Population is generally decreasing in our part of Ohio. Recent redistricting of our Congressional District actually now includes all our school district. If you check with Congressman Gillmor's staff I believe we don't have one city over 50,000 in the 5th district, which stretches from the Indiana border to the Amish Country south of Cleveland.
6. Metropolitan Toledo includes Lucas, Wood and Fulton Counties for the Dept of Labor statistics. This is really the crux of the problem as it fits comfortably into the Goldsmith formula used by your agency. A broad brush was used to implement the various programs in areas outside of New England. If the criteria of a major city in excess of 50,000 in a county is used, then due to a previous decision by the state of

Ohio, a rural township of Lucas county prevents us from receiving the Rural designation. However the designation of Urban for all of Wood County shows a lack of appreciation for the social-economic dynamics of rural north west Ohio. Wood County has no city of a population of 50,000 which is the criteria cited for Urban.

7. It was only in the past year that residents of the Tontogany-Haskins area could have

local access to Toledo. This was through an additional charge by GTE/Verizon. This does not include the suburban community of Maumee which is closer to our district and has St. Luke's Hospital, physician and medical offices, which is the primary EMT response center for our northern area in lieu of Bowling Green's Wood County Hospital. Maumee also contains the large grain elevator firms whom our farm families deal with and purchase supplies through. This additional charge, in lieu of long distance charges, applies to all residents, schools and small businesses. GTE/Verizon had to know that access to Toledo meant access to these medical facilities and international grain terminals to residents of our area. This does not conform with the spirit of the ACT when the Urban definition is applied. Rather it reflects the criteria for Rural in that the surcharge is charged to the school district, rural health providers and qualified residents

for Universal Service as covered under the ACT.

I fully appreciate the current problem facing your agency. With a new census, and no one apparently available to implement a modification of the Goldsmith formula, a readjustment of the formula is not readily available. Due to my experience in the military and chemical engineering fields, I fully appreciate the mental gymnastics required to develop a formula using statistical data to cover this field. It, however, does not exonerate your agency from not having a viable appellate system to address problems such as ours.

I would, therefore, ask that your office look into our situation and designate Otsego School District as a rural school district and eligible to receive the upgraded discount of 60 percent.

I wish to take this time to thank you for your consideration, both for the Otsego Cost Containment Committee and myself. We would be happy to escort you or your representative around our district if the opportunity ever presents itself.

Respectfully yours,

John L. Turkal

Otsego Cost Containment Committee

Enclosures: 2

cc: J.Long

Congressman Gilmor

G. Lipscomb

Otsego Cost Containment Com.



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